



## ecology and environment, inc.

101 YESLER WAY, SEATTLE, WASHINGTON, 98104, TEL. 206/624-9537

International Specialists in the Environment

*Bill H*

December 17, 1987

Carl G. Kits  
Environmental Protection Agency  
1200 Sixth Avenue, HW-113  
Seattle, WA 98101

Ref: T10-8707-004

Dear Carl:

Enclosed is the final report for the site assessment at Alaska Steel and Supply, located at 3410 E. Desmet Street, Spokane, Washington. The assessment was conducted by the TAT on September 10, 1987.

Remedial or removal actions may be warranted for soils on site. Analytical results of soil samples indicated total PCB concentrations of 30.2 ppm at a depth of one foot and 16.1 ppm at a depth of two feet in one sampling location.

It is also recommended that further characterization of the areal and vertical extent of contamination be conducted at Alaska Steel and Supply. Soil samples should be collected at depths of at least four inches to bypass fill material that has been placed on site.

One sample was collected for mercury analysis only. Results revealed a total mercury concentration of 5.8 ppm. According to US EPA, SW-874, Hazardous Waste Land Treatment, trace mercury content of natural soils ranges from 0.01 - 0.3 ppm. Soil samples should also be analyzed for EP TOX mercury to characterize the leachate potential of the contaminated soil.

Sincerely,

*Richard W. Fullner*

Richard W. Fullner  
TAT Leader

PVV/thl

Enclosure



# **ecology and environment, inc.**

101 YESLER WAY, SEATTLE, WASHINGTON, 98104, TEL. 206/624-9537

International Specialists in the Environment

## **TECHNICAL ASSISTANCE TEAM**

**SITE ASSESSMENT  
FOR:**

**ALASKA STEEL AND SUPPLY  
SPOKANE, WASHINGTON**

**TDD T10-8707-004**

**REPORT PREPARED BY: ECOLOGY AND ENVIRONMENT, INC.  
PROJECT MANAGER: PETER WITT  
DATE: DECEMBER 1987**

**SUBMITTED TO: CARL G. KITZ, DEPUTY PROGRAM OFFICER  
SUPERFUND RESPONSE AND INVESTIGATION SECTION  
U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION X  
SEATTLE, WASHINGTON**

# ABSTRACT

Pursuant to Technical Directive Document (TDD) T10-8707-004 the Technical Assistance Team (TAT) performed a site assessment of Alaska Steel and Supply in Spokane, Washington. The assessment was designed to determine subsurface soil polychlorinated biphenyl (PCB) concentrations in "hot spots" located by previous Washington Department of Ecology (Ecology ) surface soil sampling.

To accomplish this objective seven subsurface soil samples were collected at varying depths up to two feet below ground surface for PCB analysis. One subsurface soil sample was collected and analyzed for mercury.

Analytical results showed PCB concentrations ranging from <0.1 to 30.2 ppm. Results of the mercury analysis revealed a concentration of 5.8 ppm total mercury at a single sampling location.



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International Specialists in the Environment

## Site Assessment Report for:

Alaska Steel and Supply  
Spokane, Washington  
TDD T10-8707-004

### Name/Address:

Alaska Steel and Supply  
E. 3410 Desmet Street  
Spokane, Washington

### Investigation Participants

Peter Witt, TATM-Petroleum Engineer, E&E, Seattle  
(206) 624-9537

Thomas Ashley, TATM-Chemical Engineer, E&E, Seattle  
(206) 624-9537

### Principal Site Contact:

Mr. Robert MacPherson - Rothrock Carstens Co.  
E. 715 Sprague, Spokane, WA (509) 747-6160

### Date of Site Assessment:

September 10, 1987

### 1.0 INTRODUCTION

Alaska Steel, located in Spokane, Washington, was a metal salvage recycler for at least 12 years until 1987.

On April 23, 1985 the U.S. Environmental Protection Agency conducted a PCB inspection and sampling of a transformer containing oil at Alaska Steel. This inspection revealed PCBs in the transformer oil at a concentration of 20 ppm (1). At the time of the EPA inspection there was insufficient information to warrant soil sampling. On July 9, 1986 the Washington Department of Ecology (Ecology) investigated allegations made by former employees of the Alaska Steel operation, that PCB contaminated transformer oil and mercury containers were disposed of improperly on the property from 1980 to 1983. Ecology collected six surface soil samples for PCB analysis; results ranged from 0.237 to 1530 ppm total PCB (2).

Based on the above information, the EPA Region 10 Superfund Response and Investigation Section (SRIS) tasked the Ecology & Environment, Inc. Technical Assistance Team (TAT) to

perform a site assessment under Technical Directive Document (TDD) T10-8707-004. The purpose of the assessment was to determine PCB concentrations at depths of up to 2 feet using Ecology surface soil sampling results for guidance.

## 2.0 OWNER/OPERATOR

Alaska Steel & Supply Company was owned and operated by Mr. Louis Schwartz until August 15, 1987 when the property was purchased by Rothrock Carstens Co. (3).

## 3.0 LOCATION

The former Alaska Steel and Supply Co. property is located at latitude 47° 40' 00" north longitude 117° 21' 30" west. The site address is E. 3410 Desmet Street, Spokane, Washington (Figure 1).

## 4.0 DESCRIPTION OF SITE AND SURROUNDING AREA

The Alaska Steel facility was located on a 225' by 275' lot in an industrial area of Spokane. Rothrock Carstens Co. has begun developing the area by erecting two large industrial buildings on a nearby property, with plans to build another on the former Alaska Steel and Supply Co. property.

## 5.0 TOPOGRAPHY AND DRAINAGE

Topography at the site is relatively flat with less than 3% slope. There are no drainage ditches in close proximity to the site. There are two schools and three parks within one mile of the site, and Spokane Community College is located within a 1/2 mile of the site (4).

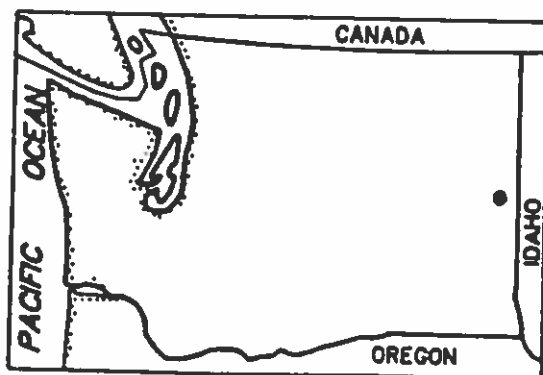
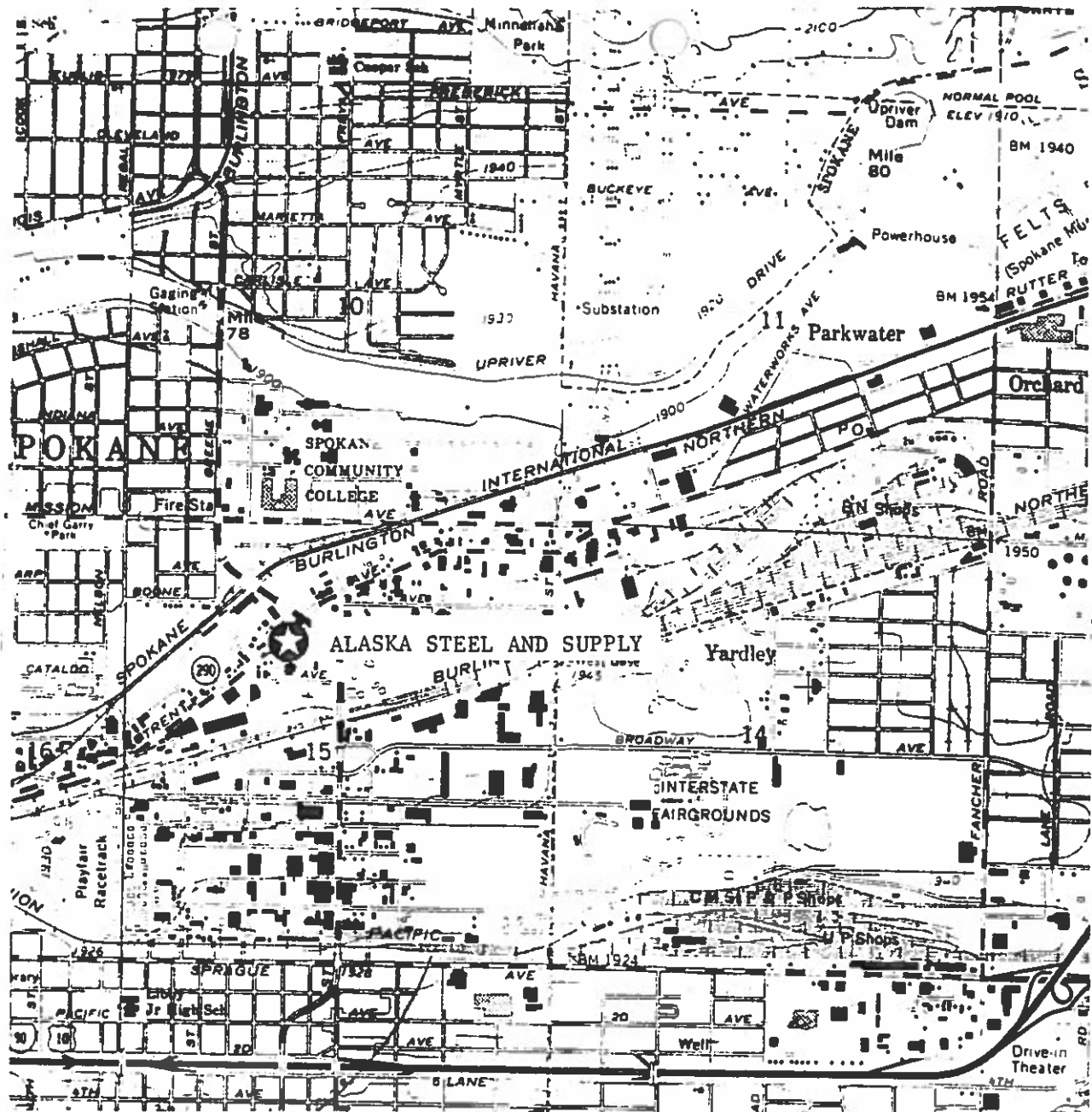
## 6.0 GEOLOGY

The Alaska Steel site is located 0.5 mile south of the Spokane River and is situated over the Spokane Valley-Rathdrum Prairie Aquifer, which has been designated as a "sole source" aquifer (5).

Undisturbed surface soil in the area is composed of gravelly loam of the Garrison series. The Garrison gravelly loam is typically an excessively drained, gravelly or stony soil derived from glacial activity, and mixed in the upper part with volcanic ash (6).

Area well logs typically show topsoil to a depth of 2 to 3 feet lying above sand, gravel, and cobbles, which extend to a depth in excess of 100 feet below ground surface.

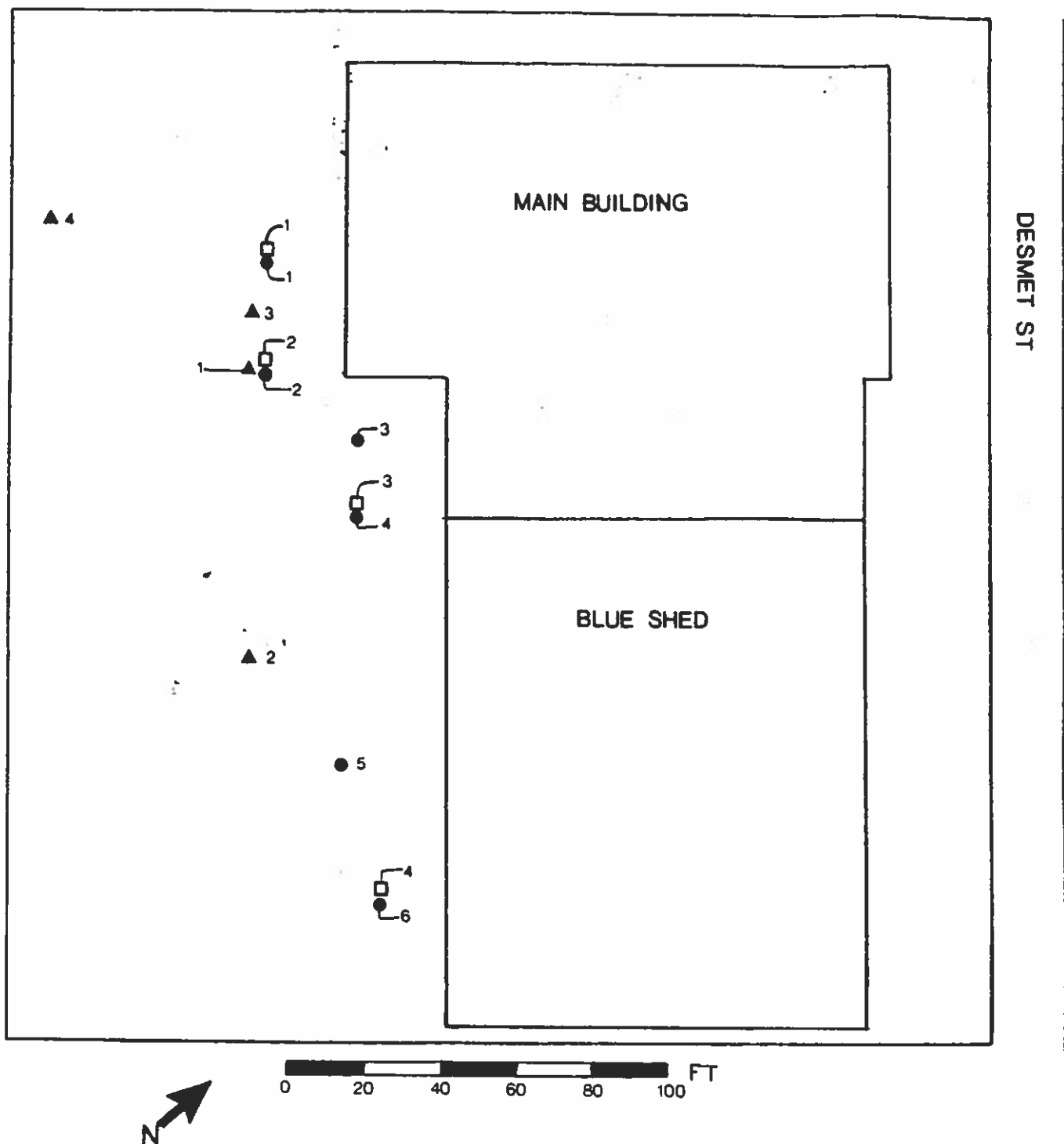
Static water levels obtained from three drillers logs within a one mile radius from the site range from 25 to 85 feet below ground surface (7).



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Job: T10-8707-004	Waste Site: 0525
Drawn by: P. Witt	Date: 11/10/87

FIGURE #1  
Site Location Map  
For Alaska Steel and Supply  
Spokane, Washington



### LEGEND

- ▲ TAT pit sample location
- Ecology sample location
- George Maddox Assoc. sample location

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Job: T10-8707-004	Work Site: 0525
Drawn by: P. Witt	Date: 11/10/87

FIGURE #2

Site Map  
For Alaska Steel and Supply  
Spokane, WA

The regional direction of groundwater flow is toward the west, following the general surface gradient of the Spokane Valley (8).

#### 7.0 WATER USE

Ground water within three miles of the site is used for both domestic and public water supplies. Three wells located within 1/2 mile of the site are used for both domestic and industrial purposes (7).

The Spokane River, located 1/2 mile north of the site, is used for recreation, irrigation and hydroelectric power generation.

#### 8.0 OVERVIEW OF SITE OPERATIONS

The Alaska Steel site was a metal salvage recycling operation for at least 12 years before the property was sold to Rothrock Carstens Company on August 15, 1987. Allegations made by former employees stated that Alaska Steel drained transformer oil and buried mercury containers on the property from 1980 to 1983.

#### 9.0 TAT INSPECTION

The TAT commenced inspection of the Alaska Steel premises at 1030 on September 10, 1987 with Mr. John Sainsbury, EPA Region 10 SRIS, in attendance. Access to the property was granted by Robert MacPherson of Rothrock Carsters Company upon completion of a Consent to Access Property form. During the inspection, 20 empty 55-gallon drums were observed stacked against the eastern wall of the Alaska Steel building. There were also several small metal scraps throughout the property. Although oil stained soil was not visible at the surface, there was patchy dried and dead grass throughout the site.

#### 10.0 SAMPLING PROGRAM

##### 10.1 Previous Sampling

On April 23, 1985 an EPA inspection was performed by Mr. Paul Boys. The inspection was carried out to determine compliance with the polychlorinated biphenyls (PCB) regulations adopted by EPA pursuant to the Toxic Substances Control Act (TSCA). A sample of transformer oil obtained during this inspection revealed PCB at a concentration of 20 ppm.

After receiving complaints from employees of Alaska Steel, Ecology collected six surface soil samples on the Alaska Steel property on July 9, 1986. According to Ecology observations, surface soils at the site were heavily stained with oil.



Analytical results revealed PCB contamination in all six samples with concentrations ranging from 0.237 to 1530 ppm. Results are presented in Table 1 with sampling locations indicated on Figure 2.

TABLE 1

Alaska Steel  
Spokane, Washington  
Analytical Results  
of Ecology Sampling  
for Surface Soil Samples Collected  
July 9, 1986  
(ug/kg - ppb)

---

Analyte	Sample Loc. #1	Sample Loc. #2	Sample Loc. #3	Sample Loc. #4	Sample Loc. #5	Sample Loc. #6
PCB1016	160U	100000U	30U	1000U	1670U	250U
PCB1221	160U	100000U	30U	1000U	1670U	250U
PCB1232	160U	100000U	30U	1000U	1670U	250U
PCB1242	160U	100000U	30U	1000U	1670U	250U
PCB1248	160U	1044579	30U	1000U	18424	2253
PCB1254	1237	486186	142	2971	1670U	250U
PCB1260	539	100000U	95	3888	1670U	305

---

U - compound was analyzed for but not detected at the stated detection limit.

---

Rothrock Carstens Company contracted George Maddox and Associates to collect soil samples on the Alaska Steel property. On July 22, 1986 George Maddox and Associates collected four surface soil samples for PCB analysis. Analytical results and sample locations are found in Table 2 and Figure 2, respectively.

## 10.2 TAT Sampling

The TAT sampling program was designed to characterize PCBs in the on-site soil at depths to two feet below ground surface (bgs). Sampling locations and analytical parameters were established by the EPA On-Scene Coordinator using the 1986 Ecology surface soil sampling results for guidance.

The TAT hand dug four pits using a pick and shovel. A total of eight soil samples were collected from these pits. In pits numbered 1, 2 and 3 two subsurface soil samples were collected at the different depths. To investigate the alleged burial of mercury containers one subsurface soil sample was collected in Pit 4 at a depth of 6-8 inches; this sample was analyzed for total mercury only. A blind replicate for quality assurance/quality control purposes was collected in pit 2 at a depth of one foot.

TABLE 2

Alaska Steel  
Spokane, Washington  
Analytical Results  
of George Maddox and Associates Sampling  
for Surface Soil Samples Collected  
July 22, 1986  
(ug/kg - ppb)

---

Analyte	Sample Loc. #1	Sample Loc. #2	Sample Loc. #3	Sample Loc. #4
PCB1242	13	259	12	84
PCB1254	ND	ND	ND	ND
PCB1260	2	103	1	1

---

ND - not detected

---

The vertical soil profile of pit 1 revealed a dark stained soil layer at a depth of 2-3 inches. This stained layer appeared to have been artificially cemented by an oily or a tarry substance. Also visible in this layer were insulator pieces and copper windings. Above this dark oil stained layer was a clean fill layer, consisting of sand and gravel. Below the heavily stained area the soil appeared to be oil stained, but not as dark as the upper stained layer.

All samples were handled, packaged, documented, shipped and analyzed as described in the TAT Sampling Plan/QA Project Plan (9). Analytical results of the TAT sampling are summarized in Table 3 and the sample locations are indicated on Figure 2.

#### 11.0 RESULTS AND DISCUSSION

Table 3 presents the results of subsurface soil sampling carried out at Alaska Steel and Supply. The TAT Quality Assurance review found all data to be acceptable (Appendix A).

Pit 1 contained the highest concentrations of PCBs with total PCB concentration of 16.1 ppm at 20-24 inches b.g.s. and 30.2 ppm at 8-12 inches b.g.s. The Ecology surface sample total PCB concentration at this location was 1530 ppm.

Sample results from pit 2 revealed total PCB concentrations of 2.5 ppm at 4-6 inches b.g.s. and 1.5 ppm at 12 inches b.g.s. Results from pit 3 revealed concentrations of 0.7 ppm at 12 inches b.g.s. and <0.1 ppm at 4-6 inches b.g.s.

The subsurface sample from pit 4 was analyzed for mercury only. Analytical results revealed a concentration of 5.8 ppm total mercury at a depth of 6-8 inches b.g.s.

TABLE 3

Alaska Steel  
Spokane, Washington  
Analytical Results  
of TAT Sampling for  
Subsurface Soil Samples Collected  
September 10, 1987  
(ug/kg - ppb)

Sample #	Pit #	Depth (inches)	PCB 1242	PCB 1248	PCB 1254	PCB 1260	Mercury
T7090340	1	20-24	8.8	ND	7.3	ND	--
T7090341	1	8-12	15.7	ND	14.5	ND	--
T7090342	2	4-6	1.1	ND	1.4	ND	--
T7090343	2	12	0.8	ND	0.7	ND	--
T7090344	3	12	0.3	ND	0.4	ND	--
T7090345	3	4-6	<0.1	ND	<0.1	ND	--
*T7090346	2	12	0.7	ND	0.7	ND	--
T7090347	4	4-6	--	--	--	--	5.8

\* Replicate of T7090343

-- Not Analyzed

ND Not Detected

## 12.0 SUMMARY

The Alaska Steel facility was located on a 225 by 275 foot lot in an industrial area of Spokane. Groundwater within three miles of the site is used for both domestic and public water supplies. The static water levels in wells within a one-mile radius of the site range from 25 to 85 feet below ground surface.

On July 9, 1986 Ecology investigated allegations made by former employees of Alaska Steel of improper handling of PCB contaminated transformer oil, and the burial of mercury containers on site. Ecology collected six surface soil samples for PCB analysis. Results ranged from 0.237 to 1530 ppm total PCB.

Eight total subsurface soil samples were collected by the TAT. Of these eight samples, seven samples were collected to determine PCB concentrations at depths up to 2 feet. PCB analysis revealed total concentrations ranging from <0.1 ppm to 30.2 ppm.

One subsurface soil sample was taken to determine levels of mercury in the soil. Results revealed 5.8 ppm total mercury.

#### REFERENCES

1. EPA Memorandum. Dec. 4, 1985. To: Louis Schwartz, owner Alaska Steel and Supply. From: Gil Haselberger, EPA-Chief Toxic Substances Branch.
2. Ecology Memorandum. Aug. 28, 1986. To: Jim Malm, ERO Spokane. From: Bob Carrell, Chemist, Ecology.
3. Spokane Treasure's Tax Information Memorandum. Nov. 4, 1987. To: Peter Witt, Ecology & Environment. From: Chas Mutschler, Assistant Archivist.
4. Spokane Street Map. Gousha/Chek-chart, A Times Mirror Company.
5. U.S. Geological Survey. 1986. Open Field Report 85-496: A Preliminary Evaluation of the Geohydrology and Water Quality of the Greenacres Landfill Area, Spokane County, Washington.
6. Soil Conservation Service. 1986. Soil Survey of Spokane County, Washington. U.S. Dept. of Agriculture.
7. Water Well Logs. 1987. Washington Department of Ecology, Spokane, Washington.
8. U.S. Geological Survey (USGS). 1987. Spokane Valley Rathdrum Prairie Aquifer, Washington-Idaho, USGS, Tacoma, Washington.
9. Ecology and Environment, Inc., 1987. Alaska Steel and Supply Work Plan/QA Plan. U.S. Environmental Protection Agency Region X, SRIS, TDD T10-8707-004.

## APPENDIX A



## ecology and environment, inc.

101 YESLER WAY, SEATTLE, WASHINGTON, 98104, TEL. 206/624-9537

International Specialists in the Environment

### MEMORANDUM

DATE: November 20, 1987

TO: Peter Witt, TATM, Petroleum Engineer, E&E, Seattle

FROM: Michael G. Bray, TATM, Chemist, E&E, Seattle *MB*

SUBJ: Analysis Data Quality Assurance Review, Alaska Steel & Supply

REF: TDD: T10-8709-005  
PAN: TWA-0525-AAA

Ecology & Environment Inc. received a summary of Mercury analysis from a sample collected at Alaska Steel and Supply. The mercury analysis were performed by Sound Analytical Services, Inc., Tacoma, Washington. There is insufficient information for the verification of the results and consequently a quality assurance review cannot be performed.

The sample numbered: T7090347

cc: Richard W. Fullner



## ecology and environment, inc.

101 YESLER WAY, SEATTLE, WASHINGTON, 98104, TEL. 206/624-9537

International Specialists in the Environment

### MEMORANDUM

DATE: November 30, 1987

TO: Peter Witt, TATM, Petroleum Engineer, E&E, Seattle

FROM: Michael G. Bray, TATM, Chemist, E&E, Seattle *MB*

SUBJ: PCB Analyses Data Quality Assurance Review, Alaska Steel and Supply

REF: TDD: T10-8709-005  
PAN: TWA-0525-AAA

The quality assurance review of 7 soil samples collected from Alaska Steel and Supply has been completed. PCB analyses were performed by Sound Analytical Services, Inc., Tacoma, Washington.

The soil samples were numbered:

T7090340 through T7090346

#### Data Qualifications:

##### I Sample Holding Times - Acceptable

Date Sampled	Date Extracted	Date Analyzed
9/10/87	9/14/87	9/16/87

Required: extraction within 7 day, analyzed within 40 days.

##### II Calibration - Acceptable

Initial calibration only

% RSD = 6.2% for Aroclor 1242  
% RSD = 9.9% for Aroclor 1254  
% RSD required <10%

##### III Blanks - Acceptable

Method Blank - no peaks found, detection limited not given



IV Surrogate Recovery - Surrogates not used

No specific action required

V Matrix Spike/Matrix Spike Duplicate

Matrix Spike - Acceptable

Aroclor 1254 - 92.86% recovery

Matrix Spike Duplicate - not performed

No specific action required.

VI Compound Identification - Acceptable

Quantitation Peak Retention Times

Sample I.D.	Peak 1 Aroclor 1242	Peak 2 Aroclor 1242	Peak 1 Aroclor 1254	Peak 2 Aroclor 1254
Standards	3.94	5.37	13.23	14.16
T7090340	3.90	5.31	13.14	14.08
T7090341	3.89	5.32	13.13	14.06
T7090342	3.89	5.31	13.13	14.08
T7090343	3.90	5.32	13.14	14.08
T7090344	3.90	5.34	13.14	14.08
T7090345	N/D	N/D	N/D	N/D
T7090346	3.91	5.34	13.17	14.11

Second column confirmation was not performed. In the reviewers opinion second column confirmation was not necessary for compound identification.

VII Overall Assessment of Data

The usefulness of the data is based on the criteria outlined in the "Laboratory Data Validation Functional Guidelines for Evaluating Pesticides/PCB's Analysis (R-582-5-01).

The data is acceptable for use.

cc: Richard W. Fullner, TATL, E&E, Seattle

# ROUTING AND TRANSMITTAL SLIP

Date

6-2-87

TO: (Name, office symbol, room number, building, Agency/Post)

Initials

Date

1. Carl Kitz

2.

3.

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

## REMARKS

Carl- Here is Alaska Steel + Supply, Spokane file. We have held off doing anything since November on the assumption a PA was going to be performed. We need to know as soon as possible if it is as this company is trying to develop this land. Thanks

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No. Bldg.

AT-093

Phone No.

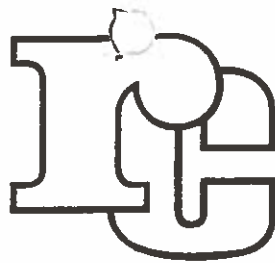
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Bur Hedgebato

5041-102

☆ U.S. GPO: 1985-9-247/40002

OPTIONAL FORM 41 (Rev. 7-76)  
Prescribed by GSA  
FPMR (41 CFR) 101-11.206



ROTHROCK,  
CARSTENS CO.

(509) 747-6160 • East 715 Sprague Ave., Suite 201 • Spokane, WA 99202

RECEIVED

MAR 09 1987

February 28, 1987

Mr. William Hedgebeth  
EPA Region 10  
1200 Sixth Avenue, M/S 524  
Seattle, WA. 98101

Dear Mr. Hedgebeth:

In response to Mr. Hazelberger's letter dated January 22, please be advised that we have tried unsuccessfully 5 times to arrange a meeting with our consultant, Mr. George Maddox and Mr. Louis Schwartz, the former property owner who represented to us that there were no chemicals dumped in the ground. As soon as we can get these people together we will respond to your letter.

Sincerely,

ROTHROCK, CARSTENS CO.

  
F. W. Rothrock, Jr.  
President

FWR:mo

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 SIXTH AVENUE  
SEATTLE, WASHINGTON 98101



REPLY TO  
ATTN OF:

M/S 524

JAN 22 1987

F.W. Rothrock, Jr., President  
Rothrock, Carstens Company  
East 715 Sprague Avenue, Suite 201  
Spokane, Washington 99202

Dear Mr. Rothrock:

We have received your letter of December 8, 1986, which responded to our letter of November 10, 1986, requesting information regarding PCB contamination on site at the former Alaska Steel and Supply property at E. 3410 Desmet, Spokane, Washington.

In regard to EPA's letter of December 4, 1985, concerning EPA's April 23, 1985 PCB inspection of Alaska Steel and Supply, it is incorrect to surmise that EPA determined that there were no PCBs on site. The inspection did not reveal any violations of the PCB Regulations that were apparent. However, the inspection did not include any kind of extensive soil sampling of the site and therefore would not have been able to document soil contamination that existed at the time. Such soil sampling would not ordinarily take place unless there was specific knowledge that such soil contamination existed or that spills had occurred. At the time of the EPA inspection in 1985, EPA was not aware of any such spills or contamination.

Our investigation of the contamination at this site is continuing and will continue at least until the PCB contamination is removed from the site. You should note that 40 CFR §761.60(d)(2) requires that PCBs resulting from the cleanup and removal of spills, leaks, or other uncontrolled discharges be stored and disposed of in accordance with 40 CFR §761.60(a). 40 CFR §761.60(a)(4) states that any non-liquid PCBs at concentrations of 50 ppm or greater in the form of contaminated soil, rags, or other debris shall be disposed of:

- a) in an incinerator pursuant to 40 CFR §761.70; or
- b) in a chemical waste landfill pursuant to 40 CFR §761.75.

It is also important to note that all PCBs resulting from spills of liquids containing 50 ppm or greater must be properly disposed of and, thus, the contaminated soil must be cleaned up to pre-contamination levels of approximately 2 ppm PCB, and the contaminated soil and debris properly disposed of in accordance with 40 CFR §761.60(a). Therefore, sealing the pad by constructing a building over the area is not permitted by the PCB regulations and the PCBs must be legally disposed of.

Although you have provided us with four sample results, it does not appear that they result from the use of a reliable, standardized sampling grid methodology, and thus cannot be relied on to be representative of the contamination on site. The site must be restored to pre-contamination levels. To achieve this, you should start by establishing a representative sampling grid. We are enclosing a copy of two EPA documents that may assist you in setting up such a grid. The documents enclosed are:

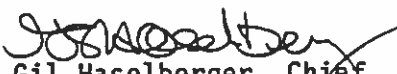
1. EPA Document Number 560/5-85-026: Verification of PCB Spill Cleanup By Sampling and Analysis.
2. EPA Document Number 560/5-86-017: Field Manual For Grid Sampling of PCB Spill Sites To Verify Cleanup.

Soil removed from the facility that contains detectable amounts of PCB (i.e., greater than two parts per million PCB), should be disposed of in a chemical waste landfill that has been approved for PCBs by EPA. There are two such landfills in EPA Region 10. They are:

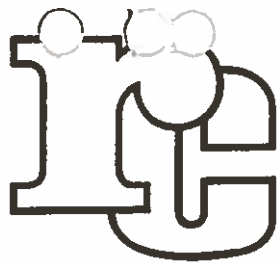
1. Chem-Security Systems, Inc.  
Star Route  
Arlington, Oregon 97812  
(503) 454-2777
2. Envirosafe Services of Idaho, Inc.  
P.O. Box 417  
Boise, Idaho 83701  
(208) 384-1500

Within two weeks of your receipt of this letter, please advise us, in writing, of your plans for remediating this site. If you have any questions regarding this letter, please contact William M. Hedgebeth of my staff. He can be reached at EPA Region 10, 1200 Sixth Avenue, M/S 524, Seattle, Washington 98101, telephone (206) 442-7369.

Sincerely,

  
Gil Haselberger, Chief  
Toxic Substances Section

Enclosures



ROTHROCK,  
CARSTENS CO.

(509) 747-6160 • East 715 Sprague Ave., Suite 201 • Spokane, WA 99202

*Must December*  
November 8, 1986

RECEIVED  
DEC 19 1986

PESTICIDES & TOXIC  
SUBSTANCES BRANCH  
EPA REGION 10

Mr. Gil Haselberger  
U. S. Environmental Protection Agency  
Toxic Substances Section  
1200 Sixth Avenue  
Seattle, WA. 98101

Dear Mr. Haselberger:

I have been out of town and apologize for not having responded sooner. I will respond to your questions in order.

1. When we acquired the property from Alaska Steel and Supply, we were told verbally that there were no PCB's on the site. Mr. Louis Schwartz furnished us with correspondence from Northwest Environmental Services and from the U. S. Environmental Protection Agency. Northwest's letter of November 5, 1985 stated that there were no PCB's and a letter from your office concerning an inspection by Mr. Paul Boys on April 23, 1985 concluded that there were no PCB's. These letters are on file in our office.
2. Dr. George Maddox has conducted an independent sampling on the property. Copies showing the extent of the sampling and the results are enclosed.
3. We feel that the best mode of clean-up would be to seal the pad. We have been advised by consultants that PCB's will not migrate with moisture in an unsaturated zone to the underlying water table and would only move with surface erosion of the soil to the water source.

The property upon which the PCB's exist is being developed as an industrial business park. A building is eventually planned in the area where the PCB's exist. (Please see attached brochure). Our concept would be to seal the material with the building to be built on the site.

Mr. Gil Haselberger  
Page 2  
December 8, 1986

Additionally there is no topographic drainage for overland flow of water towards the Spokane River or its tributaries, so the site should remain relatively stable.

If we can provide you with further information, please let us know.

Sincerely,

ROTHROCK, CARSTENS CO.

*F. W. Rothrock, Jr.*  
(63)

F. W. Rothrock, Jr.  
President

Enclosures

FWR:mo

MEMORANDUM  
OF CALL

*Call David*  
Previous editions usable

TO:

*Gil*

☐ YOU WERE CALLED BY— ☐ YOU WERE VISITED BY—

*Steve Rathrock*  
OF (Organization)

*Rathrock-Karsten Co*

☐ PLEASE PHONE ► ☐ FTS ☐ AUTOVON

*(509) 747-6160*

☐ WILL CALL AGAIN ☐ IS WAITING TO SEE YOU

☐ RETURNED YOUR CALL ☐ WISHES AN APPOINTMENT

MESSAGE

*He has contacted  
a geotechnical engr.  
and will be respond-  
ing to your letter.*

RECEIVED BY

*Wend*

DATE

*11/28*

TIME

*4:30*

63-110 NSN 7540-00-634-4018

★ ~~U.S. GPO~~ 1965-0-491-247/20034

STANDARD FORM 63 (Rev. 8-81)

Prescribed by GSA  
FPMR (41 CFR) 101-11.6



Alaska Steel and Supply  
9 a.m. 11-17-86

Dabroski  
Samsbury  
Hedge  
Atteman

Samsbury discussed site with Jim Malm - Ecology  
Samples were surface samples - soil was  
very compact -

Samsbury wanted to go down 1-2 feet and Malm  
said it would be virtually impossible now with  
the soil frozen

Dabroski called Jim Malm

Malm - development of site probably not imminent

- ground starting to freeze

- in July, material sampled was real compacted

Samsbury - will probably wait until spring

Malm - probably will be sparring between Schwartz  
and Rothrock

- probably not an imminent health hazard from  
State's point of view

- running out of authority

- potential contamination of Spokane's sole source  
aquifer but PCBs don't migrate

- ~~Sch~~ Rothrock has developed part of property -

- put a large industrial park type bldg. on it -

- not aware of any problems at that location  
(250-300 feet from contaminated area)

Dabroski - what is State's view of EPA coming in

Malm - hasn't talked to attorneys - talked to ~~Robert~~

permit and RCRA coordinators and they suggested  
talking to EPA since PCBs were involved.

Dabroski - John (Samsbury) - we should probably brief SF

- Malm will talk to boss and regional manager re what they want to do.

Samsbury was brief Phil Mellam

Hedgebeth - talk to Gil/Anita re willingness to go forward with this effort.

Conference Call : Bu. Holgeboth and David Dahroski

Alaska Steel and Supply

November 13, 1986

Call to John Bartlett (509) 247-5770

~~9:25 a.m.~~  
9:25 a.m.

David made call

- discussed confidentiality - cannot guarantee confidentiality although we will do our best to maintain such conf. - discussed FOIA - if inv. leads to action, while case is being developed, rules for federal rules of procedure provide limited means for conf. - Bartlett stated he understood.

Bartlett - most info was through other employees that worked there previous to him, that worked with ~~employees~~ transformers - he only saw one transformer taken apart but didn't know whether it contained PCBs

- Started in May 1982 @ Alaska Steel + Supply
- quit in spring of 1985
- <sup>Louis</sup> Mr. Schwartz asked him to come back Aug 85, quit in April 1986 (thought business practices were unethical. (Schwartz, of Rail Water Terminal, Seattle)
- VP, Bernie Feingold, lives in Spokane
- GM, Dennis Reyvor, lives in Mead
- Feingold / Reyvor were main mgs with Aug '85, then Bartlett took over as GM
- no hard feelings between Bartlett + other 2
- doesn't know how Reyvor feels about Schwartz
- would Feingold or Reyvor know about dumping

- Fengold and Schwartz are good friends and would not say what happened
- When DOE questioned them, Fengold clammed up - told John that he would not say anything
- on S end of main bldg, fenced area - Joe <sup>Cavallaro</sup> Cavallaro, current employee, said ~~was~~ trans oil was deep enough to wade through - leaves in Reardon
- James ~~Bragley~~ <sup>Bragley</sup> said # of lines large transformers came out of BPA and Conlee Dame - ~~was~~ was scrap yard manager for ferrous and non-ferrous metals - worked for Schwartz for 15-20 years. - lives in Spokane - was let go 1/2 years ago

Dabroski - did Cavallaro talk about dumping?  
 Bartlett - yes, when they were stripping transformers out

~~D~~ ~~Magley~~ ~~was~~  
 - last observed trans. being cleaned (WZOKUA) was first summer he was there (1982) - oil tipped over

D - Who else might know of act  
 B - Jerry Bergman, lives in Deer Park  
 - worked w/ Bartlett in retail outlet  
 - might have more peoples names - worked prior to 1982



- Magley would know about things buried in ground
- Jack Campbell worked off and on, did cleanup work

D - if we decided to pursue, would you be interested in doing this under oath with court reporter

~~BBB~~ home #(509) 456-6551 (evenings)

= doesn't know any other sources of trans.

- Schwartz is probably running Railwater Terminal (on one of old piers)

- Knows <sup>Rothrock</sup> Rothrock through real estate transaction - advised him there might be PCBs, that he sample soil

- lives next door to Jim Maen, Ecology

PS Form 3811, July 1983 447-845

**SENDER: Complete items 1, 2, 3 and 4.**

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☒ Show to whom, date and address of delivery.

2. ☐ Restricted Delivery. **WMMH**

3. Article Addressed to:  
**S. ROTHROCK, ASSOCIATED BROS.  
 ROTHROCK CARSTEN CO.  
 E. 715 SPRAGUE AVE SUITE 201  
 SPOKANE, WA 99202**

4. Type of Service: Article Number  
☐ Registered ☐ Insured **P120 915 753**  
☒ Certified ☐ COD  
☐ Express Mail

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee  
**X** *[Signature]*

6. Signature - Agent  
**X**

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

P 120 915 753

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL

(See Reverse)

\* U.S.G.P.O. 1984-448-014

Sent to **S. ROTHROCK, Assoc. Bros.**  
**ROTHROCK CARSTEN CO.**  
**E. 715 SPRAGUE AVE SUITE 201**  
**SPOKANE, WA 99202**

P.O. State and ZIP Code

Postage \$

Certified Fee

Special Delivery Fee

Restricted Delivery Fee

Return Receipt Showing to whom and Date Delivered

Return receipt showing to whom, Date, and Address of Delivery

TOTAL Postage and Fees \$

Postmark or Date

**NOV 10 1986**

PS Form 3800, Feb. 1982



U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 SIXTH AVENUE  
SEATTLE, WASHINGTON 98101

REPLY TO  
ATTN OF:

M/S 524

NOV 10 1986

CERTIFIED MAIL

Steven M. Rothrock, Associate Broker  
Rothrock, Carstens Co.  
East 715 Sprague Ave., Suite 201  
Spokane, Washington 99202

Dear Mr. Rothrock:

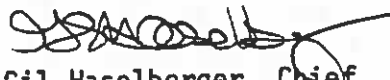
This letter concerns the property in Spokane that your company has purchased from Alaska Steel and Supply. We have received information from the State of Washington Department of Ecology regarding results of samples their Agency took on this property; analysis of those samples indicated the existence of high levels of PCB on this property. We understand that the Department of Ecology has provided you with a copy of these analytical results.

In this regard, please provide us with the following information:

1. Had you been advised by Alaska Steel and Supply of any PCB or other contamination on this property?
2. Have you conducted independent, representative sampling on this property to determine the extent of the PCB or other contamination? If so, please advise of the extent of the sampling and the analytical results of the sampling.
3. Do you have any plans for remedial cleanup on this property? If so, please describe such plans.

Please answer the above questions, in writing, within 15 days of your receipt of this letter. Your timely response to this request may obviate the need for us to seek this information through more formal means. If you have any questions, please contact William M. Hedgebeth of my staff. He can be reached at EPA Region 10, 1200 Sixth Avenue, M/S 524, Seattle, Washington 98101, telephone (206) 442-7369.

Sincerely,

  
Gil Haselberger, Chief  
Toxic Substances Section

cc: Jim Malm, Ecology

RECORD OF COMMUNICATION	<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
	(Record of item checked above)	
TO: Bill Hedgpeth Env. Protection Specialist Toxic Substances Section	FROM: Jim Malm Washington DOE Spokane	DATE 10-31-86 TIME 10:20
SUBJECT Alaska Steel and Supply		
SUMMARY OF COMMUNICATION		
<p>Jim Malm returned my phone call.</p> <p>I advised Jim that I had given information to our Emergency Response folks. They indicated there was a good chance they could get someone out to do some site testing but it may be three months before they could get out there. I then discussed situation with David Dabroski who mentioned possibility of TSCA subpoenas. In that regard, I asked Jim if he could contact informant, John Bartlett, to see if he would be amenable to this approach, and if he would mind us contacting him. Jim said he would be glad to.</p> <p>~10:40: Jim Malm called back and stated that Bartlett would be willing to cooperate with us and tell us anything we need to know.</p>		
CONCLUSIONS, ACTION TAKEN OR REQUIRED		
INFORMATION COPIES		
TO:		



## Notes on Alaska Steel and Supply

1. Call Jim Malin to discuss possible subpoena of John Bartlett. Find out what kind of information Bartlett could provide. Are there other informants who could be subpoenaed?
2. Subpoena Louis Schwartz?
3. Write Rothrock Carstens Co. re results of Ecology's sampling - recommend cleanup - ask if plans exist for cleanup (wait for Ecology's report)
4. Eventually - possible complaint against Alaska Steel and Supply for improper disposal, storage?

William M. Hedgebatt  
10-31-86

<b>RECORD OF COMMUNICATION</b>	<input type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input checked="" type="checkbox"/> OTHER (SPECIFY) <b>Note to file</b>		
	(Record of item checked above)		
<b>TO:</b>  <b>File</b>	<b>FROM:</b> <b>Bin Hedgebeth</b> <b>Env. Prot. Specialist</b> <b>Toxic Substances Section</b>	<b>DATE</b> <b>10-31-86</b>	<b>TIME</b>
<b>SUBJECT</b> <b>Alaska Steel and Supply aka Alaska Steel and Junk.</b>			
<b>SUMMARY OF COMMUNICATION</b> <p>In reviewing the State of Washington analytical report dated August 28, 1986, I noted that Sample Number 287734 actually contained a total of 1,530 parts per million (1,044 ppm 1248 and 486 ppm 1254). The report had indicated that the highest concentration detected was 1,044 ppm.</p>			
<b>CONCLUSIONS, ACTION TAKEN OR REQUIRED</b>			
<b>INFORMATION COPIES</b> <b>TO: Cane Kitz, ER.</b>			



## MEMORANDUM

RECEIVED



OCT 31 1986

PESTICIDES & TOXIC  
SUBSTANCES BRANCH  
EPA REGION 10State of  
Washington  
Department  
of Ecology

TO Bill Hedgebeth  
FROM Jim Malm 509-456-2926  
SUBJECT Alaska Steel PCB Contamination  
DATE 10-29-86

Here is the information we discussed.  
Please let me know if you are  
going to be taking any action. I'll  
proceed as best I can.

ECY 010-33

S.F. 80  ROUTING SLIP  DATE 10-29-86

TO Bill Hedgebeth

ADDRESS EPA, Region 10 MAIL STOP 524

FROM Jim Malm, WSDOE, Spokane MAIL STOP PHONE

<input type="checkbox"/> For Action	<input type="checkbox"/> Per Your Request	<input checked="" type="checkbox"/> Per Our Conversation
<input type="checkbox"/> For Approval	<input type="checkbox"/> Read and Return	<input type="checkbox"/> Read & Route to Files
<input type="checkbox"/> For Signature	<input type="checkbox"/> For Your Information	<input type="checkbox"/> For Your Comments

RECEIVED  
OCT 31 1986  
PESTICIDES & TOXIC  
SUBSTANCES BRANCH  
EPA REGION 10

<b>RECORD OF COMMUNICATION</b>		<input type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY) _____	
		(Record of item checked above)	
<b>TO:</b> Bill Hedgebeth Environmental Protection Specialist Toxic Substances Sect.,	<b>FROM:</b> Jim Malm Washington DOE Spokane (509) 456-2725	<b>DATE</b> 10-27-86	<b>TIME</b> 3:25 p.m.
<b>SUBJECT</b> Alaska Steel and Supply			
<b>SUMMARY OF COMMUNICATION</b> <p>Jim Malm called to discuss Alaska Steel and Supply Company, in Spokane. The owner of Alaska Steel and Supply sold a large part of the property to a real estate developer in Spokane. At the time of the sale of the property, there were allegations made, both by present and former employees of the operation, that PCBs had been disposed of improperly on the property (from 1980-1983?). DOE asked the seller of the property, Louis Schwartz, about these allegations. In response, Schwartz submitted to DOE a copy of a letter he had received from EPA regarding an EPA inspection, in which EPA stated that there had been no violations revealed during the inspection. This inspection took place in December 1985 and was performed by Paul Boys. A sample was taken from one transformer during this inspection and was shown to contain 20 ppm PCB.</p> <p>DOE then investigated further the complaint and took 6 shallow soil samples. The results ranged from 95 ppb PCB to 1,044 ppm PCB. This property is directly over the Spokane Aquifer. The property has now been pretty well cleared off. The purchaser, Rocky Rothrock, wants to develop the property into a small industrial park.</p> <div style="margin-top: 20px;"> <p><u>Purchaser:</u>                      Rocky Rothrock               Rothrock Carstens Co.               E. 715 Sprague Avenue               Spokane, Washington 99202               phone (509) 747-6160</p> <p><u>Location of Property:</u>    E 3410 Desmet, Spokane</p> <p><u>Seller:</u>                              Louis Schwartz</p> </div> <p>Anonymous complainant said there was a real mess behind the building at the property. DOE investigation confirmed this. The soil was very oily. The (over)</p>			
<b>CONCLUSIONS, ACTION TAKEN OR REQUIRED</b>			
<b>INFORMATION COPIES</b> <b>TO:</b> Jim Willman, Emergency Response Dixon McClary, Criminal Investigators			

company supposedly put in rocks and gravel on top of where they dumped the oil containing PCBs and then sprayed the area down with water. DOE has heard from both current and former employees. Malm has the name of one informant and can locate this ~~former~~ employee if possible. He will contact the informant and see if the informant wants their name given to EPA.

FILE

October 1, 1986

RECEIVED  
OCT 31 1986

PESTICIDES & TOXIC  
SUBSTANCES BRANCH  
EPA REGION 10

Mr. "Rocky" Rothrock  
Rothrock-Carstens Company  
E. 715 Sprague Avenue  
Spokane, WA 99202

Dear Mr. Rothrock:

Please find enclosed the results of sampling we conducted on July 9, 1986, at the Alaska Steel site.

The results indicate that polychlorinated biphenyl (PCB) contamination is present at relatively high levels. Since the samples we obtained were random grab samples, the extent of the contamination is unknown.

I am requesting that you inform me as to the actions you intend to take regarding this problem. Your written reply is requested no later than October 31, 1986.

Please call me if you have questions.

Sincerely,

James L. Malm  
Environmental Quality Division

JLM:adw

Enclosure

CERTIFIED MAIL

ANDREA BEATTY RINKER  
Director



RECEIVED

SEP 2 1986

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

DEPARTMENT OF ECOLOGY  
SPOKANE REGIONAL OFFICE

Post Office Box 346 • Manchester, Washington 98353-0346 • (206) 895-4741

MEMORANDUM

August 28, 1986

TO: Jim Malm, ERO Spokane  
FROM: Bob Carrell, Chemist *BC*  
SUBJECT: PCB's in Alaska Steel and  
Junk Samples 287733-38

Six samples, collected on July 9, 1986, were received at the Manchester Environmental Laboratory on July 11, 1986 for PCB analysis. All the samples contained PCB's in levels ranging from 95 ppb to 1044 ppm. The results of the analyses are listed below.

<u>Lab Number</u>	<u>Station Number</u>
287733	001
287734	002
287735	003
287736	004
387737	005
287738	006

<u>Sample #</u>	<u>BN6202S</u>	<u>BN6202SJ</u>	<u>287733</u>	<u>287734</u>	<u>287735</u>	<u>287736</u>	<u>287737</u>	<u>287738</u>
-----------------	----------------	-----------------	---------------	---------------	---------------	---------------	---------------	---------------

<u>Units</u>	<u>ug/Kg</u>	<u>ug/Kg</u>	<u>ug/Kg</u>	<u>ug/Kg</u>	<u>ug/Kg</u>	<u>ug/Kg</u>	<u>ug/Kg</u>	<u>ug/Kg</u>
--------------	--------------	--------------	--------------	--------------	--------------	--------------	--------------	--------------

PCB 1016	10u	10u	160u	100000u	30u	1000u	1670u	250u
PCB 1221								
PCB 1232								
PCB 1242								
PCB 1248				1044579			18424	2253
PCB 1254			1237	486186	142	2971	1670u	250u
PCB 1260			539	100000u	95	3888		305

O, P DDE,		
I.S.	102%	70%



APPENDIX A

ABC LABORATORIES, INC.  
EAST 4922 UNION AVE.  
SPOKANE, WA 99212

~ ~ ~ ~ ~

REPORT TO: George Maddox and Associates  
West 1636 First  
Spokane, WA 99204

DESCRIPTION: Perform analyses for Polychlorinated  
Biphenyls (PCB's) on four submitted soil  
samples.

LAB. NO. 2070-86

DATE: July 22, 1986

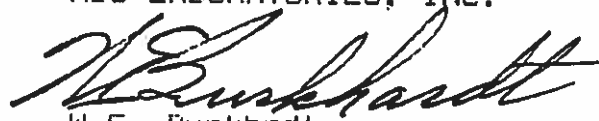
Detection Limit: one milligram/kilogram

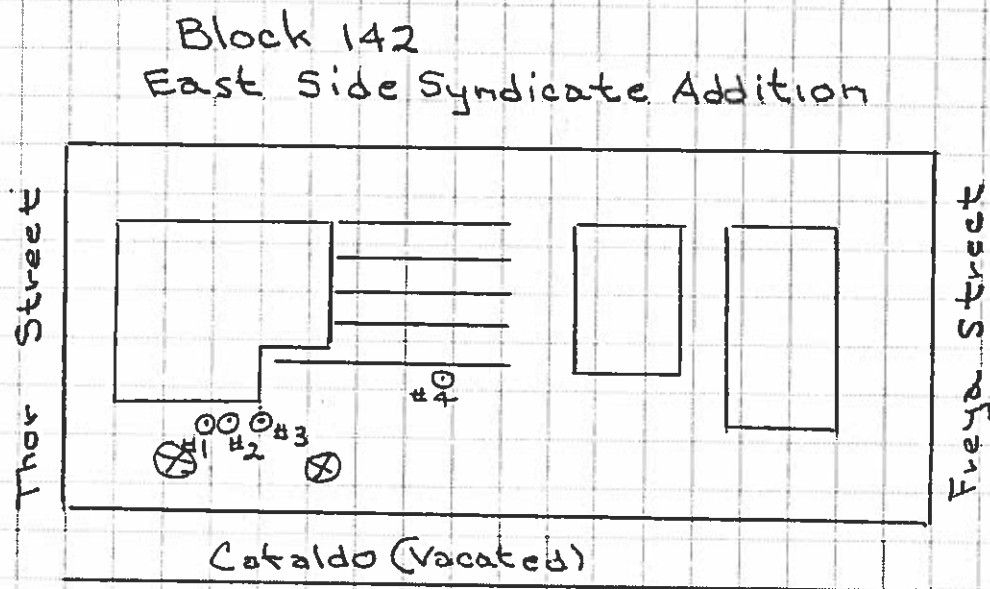
ND: Not detected

---

SAMPLE NO.	PCB, mg/kg Aroclor		
	1242	1254	1260
	----	----	----
#1	13	ND	2
#2	259	ND	103
#3	12	ND	1
#4	84	ND	1

Respectfully submitted  
ABC LABORATORIES, INC.

  
W.E. Burkhardt  
Manager



EXPLANATION

○ Sample Point

⊗ General Area Where  
Transformers Have  
Been Disassembled

Figure 1

\* Sample No. 1 (@ DOE Stake No. 1) approx. 21 ft. due S. of old  
taken ~ 5 in. below grade in sandy gravel  
(CLAST SIZE ~ 1 cm) approx. cemented artificially  
by oil or tar. Some gravel broken - some rounded  
[ENTIRE LOT MAY BE FILL] (LOTS OF "JUNK" MIXED  
IN W/SEDS.)

Sample No. 2 (@ DOE Stake No. 2) (approx. 21 ft. due E.  
OF STAKE NO. 1)  
TAKEN approx. 5 in below grade - materials same as  
in NO. 1 EXCEPT MORE OIL CONTENT - (DARKER COLOR)

Sample No. 3 (@ DOE Stake No. 4) (approx. 50 ft. NE of  
Stake No. 2)  
SOME NOTATIONS AS ABOVE, BUT approx. LESS OIL  
PRESENT - ~~is~~ is "DRIER", BUT STILL WELL  
"CEMENTED" BY SOME (PROBABLY ARTIFICIAL) AGENT.

### GENERAL SETTING

FORWARD. LOT BEHIND "ALASKA" BLDG. IS COVER WITH  
TRASH (METAL SCRAP, GLASS FRAGS, PAPER, ETC OF SMALL  
DIMENSIONS (SEE MAP) OLD BATTERY, BARRELS (~ 10) OF  
UNKNOWN CONTENTS AND OLD MACHINERY.

A WORKER CAME OUT WHILE I WAS  
SAMPLING AND SAID TWO TRANSFORMERS WERE DISASSEMBLED  
IN approx. POSITIONS SHOWN ON MAP.

\* ALL SAMPLES TAKEN FROM DOE EXCAVATIONS EXISTING



ENVIRONMENTAL COMPLAINT REPORT FORM

1. Complaint No. \_\_\_\_\_  
2. Date of Complaint 2-3-86  
3. Date of Investigation 7-9-86

I. COMPLAINT REPORTED BY

Name 2 separate Anonymous Complaints Phone No. \_\_\_\_\_

Address \_\_\_\_\_

Date and time complaint first noted Unknown

Other information \_\_\_\_\_

II. LOCATION:

4. Watercourse Over Spokane Aquifer

5. Region: ☐ Northwest ☐ Southwest ☐ Central ☒ Eastern

6. District: (1) 6 (2) \_\_\_\_\_

7. County and Town Spokane, Spokane

7a. Legal \_\_\_\_\_ Section \_\_\_\_\_ Township \_\_\_\_\_ Range \_\_\_\_\_

III. POLLUTANT:

8. Pollutant Source Transformers and mercury containers

9. Material PCBs

10. Quantity Unknown

Area or miles affected Unknown

(If dead or dying fish are visible, fill out Nos. X, XI and XII.)

IV. RESPONSIBILITY:

Louis Schwartz

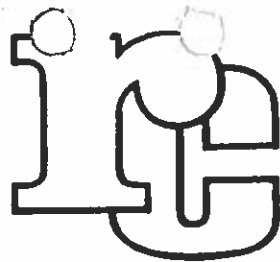
11. Person or Entity: Name Alaska Steel & Tank Phone No. 534-0531

Address E 3410 Desmet

Violator: ☐ Confirmed ☐ Suspected ☐ Unknown

V. CAUSE:

12. Brief Description: Allegations that PCB transformers were dumped on the property and mercury containers were buried.



ROTHROCK,  
CARSTENS CO.

Claude —  
Mike ~~stuck~~  
pls  
return  
Jim

(509) 747-6160 • East 715 Sprague Ave., Suite 201 • Spokane, WA 99202

June 2, 1986

RECEIVED

JUN 3 1986

Mr. James L. Malm  
Environmental Quality Division  
Department of Ecology  
N. 4601 Monroe, Suite 100  
Spokane, WA 99205-1295

DEPARTMENT OF ECOLOGY  
SPOKANE REGIONAL OFFICE

Dear Mr. Malm:

In response to your letter dated May 20, 1986, please find enclosed letters and pertinent information from the following:

Northwest Environmental Services  
U.S. Environmental Protection Agency  
provided by the former owner.

The enclosed information would seem to indicate that there are no violations of PCB regulations. Dr. Maddox informed us that this information should be sufficient.

I would like to add that we are very concerned at the way these alleged complaints have been channeled to your attention and the unorthodox method of reporting them to you. We have spent tens of thousands of dollars with Soils Engineers and following every recommendation received to make this property clean, stable and a compliment to our community.

Please call me personally if you have any additional questions.

Very sincerely yours,

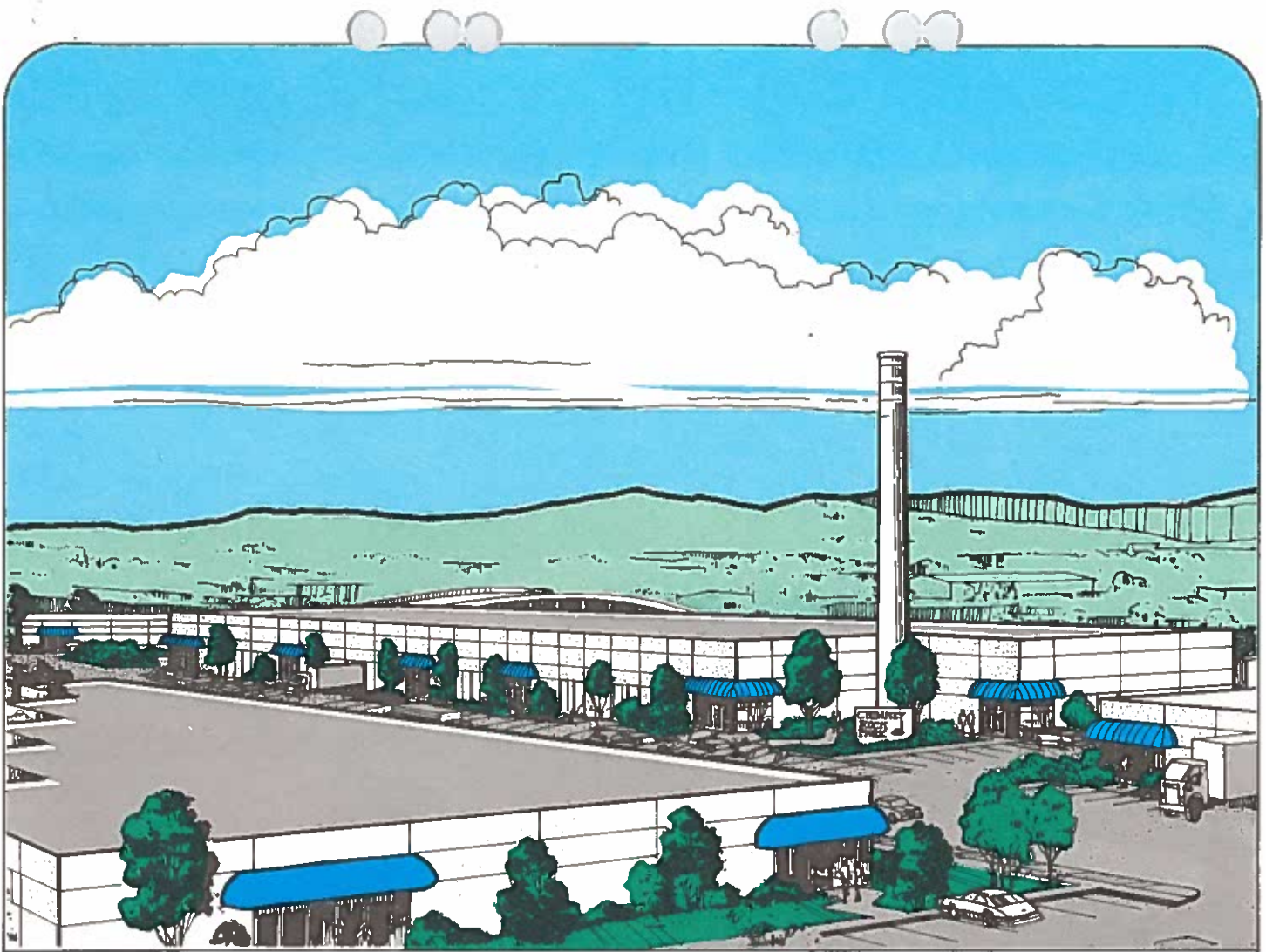
ROTHROCK, CARSTENS CO.

*Steven Rothrock*

Steven M. Rothrock  
Associate Broker

cc: Paul Allison  
R. Rothrock  
G. Maddox

Enclosure



# CHIMNEY ROCK INDUSTRIAL PARK

Developed by the Rothrock Company

Represented exclusively by the

**ROTHROCK,  
CARSTENS CO.**  
E. 715 SPRAGUE • SPOKANE, WA 99202  
509-747-6160

**A** 20 Acre  
industrial/commercial  
center, conveniently  
located in the heart  
of Spokane's quality  
industrial area, with  
easy access to major  
arterials and  
transportation facilities.



# CHIMNEY ROCK INDUSTRIAL PARK

## BUILDING FEATURES

- Secure tilt-up concrete structure
- 24 foot ceiling height for high stack storage or second floor office space
- Dock height & drive-in loading doors
- Overhead sprinkler system
- Energy conserving design
- R-19 insulated ceiling
- Air conditioned office or showroom space
- Flexible bay sizes for large or small users
- Offices designed to suit tenant
- Custom designed interiors

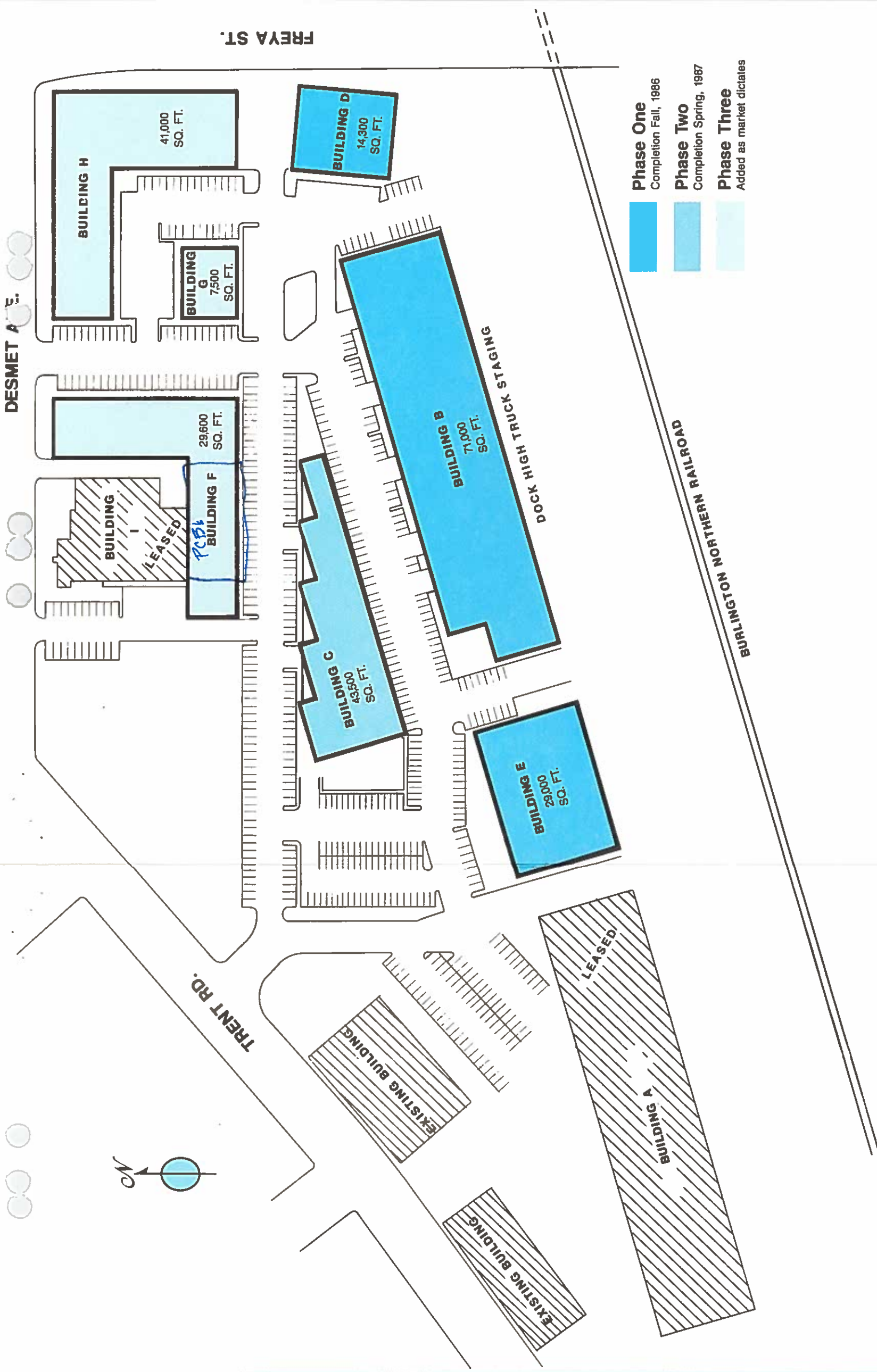
## LOCATION FEATURES

- Easy access to I-90 within ¾ mile
- High visibility frontage on Freya and Trent
- 483 parking spaces available on site
- Large truck loading area with available outside storage

## GENERAL FEATURES

- Attractive landscaping
- Zoned M-3 heavy industrial

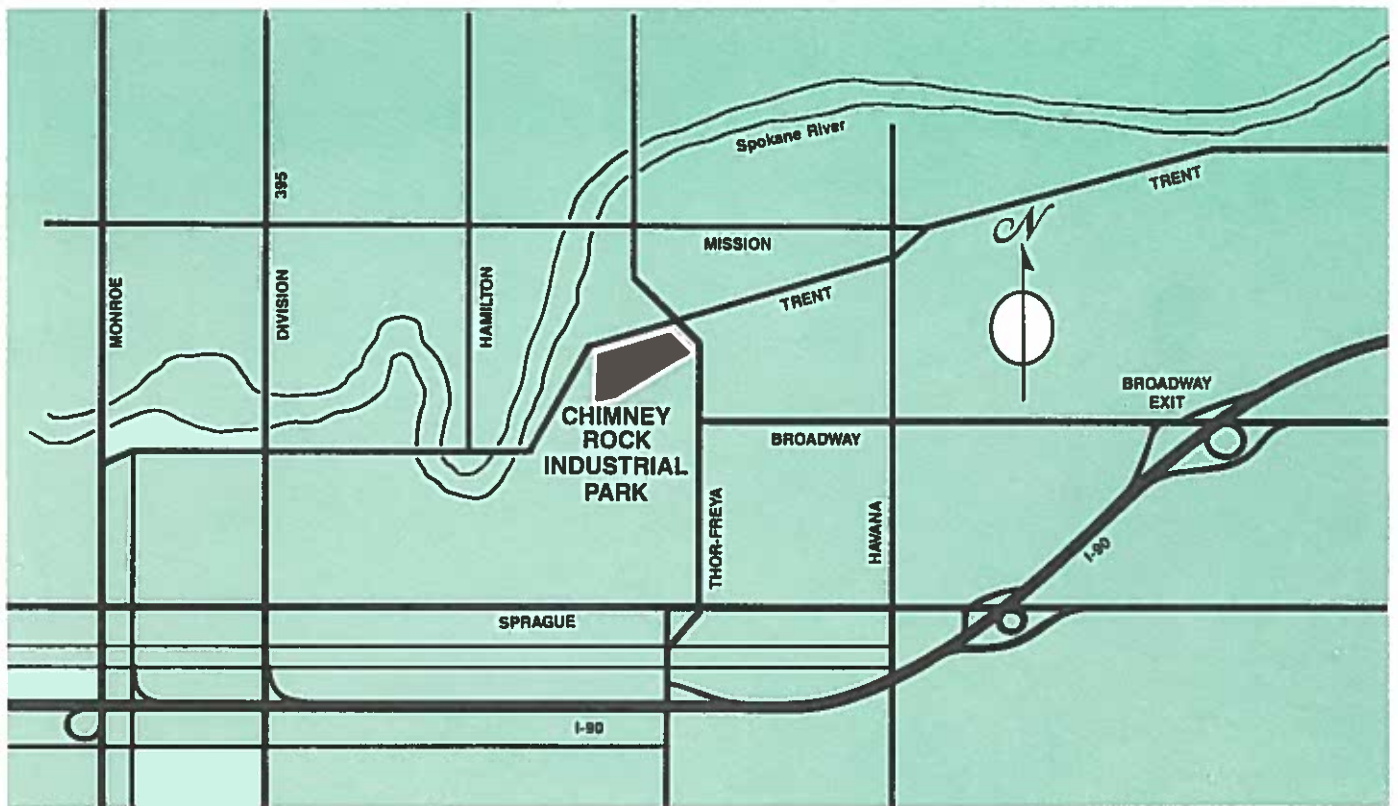
For information call  
**Rothrock, Carstens Co.**  
**(509) 747-6160**



Chimney Rock takes its name from the old Armour Chimney stack, a Spokane landmark for 60 years. Chimney Rock displays a pleasing combination of architectural design and landscaping that features native trees, shrubs and flowers from throughout the inland northwest.

Chimney Rock Industrial Park is located on the former Armour Meat Packing/Alaska Steel site. It is situated in the heart of Spokane's quality industrial area, three miles from the city center and eight blocks from I-90 on the Freya/Trent arterials.

Every structure in this industrial center has been designed to be energy and space efficient. As each new phase is constructed, a consistency of building quality will be maintained. Chimney Rock's location and flexibility of space needs is ideal for large or small space users.



For information call Rothrock, Carstens Co. (509) 747-6160

**ROTHROCK  
CARSTENS CO.**  
E. 715 SPRAGUE • SPOKANE, WA 99202  
509-747-6160



# ROUTING AND TRANSMITTAL SLIP

Date

6-2-87

TO: (Name, office symbol, room number, building, Agency/Post)

Initials

Date

1. Carl Kitz

2.

3.

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

## REMARKS

Carl- Here is Alaska Steel + Supply, Spokane file. We have held off doing anything since November on the assumption a PA was going to be performed. We need to know as soon as possible if it is as this company is trying to develop this land. Thanks

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No. Bldg.

Bur Hedgebato

Phone No.

AT-043

7369

5041-102

☆ U.S. GPO: 1985-9-247/40002

OPTIONAL FORM 41 (Rev. 7-76)

Prescribed by GSA  
FPMR (41 CFR) 101-11.206

FILE

Mike S W. J. S.  
p/s return

May 20, 1986

Mr. "Rocky" Rothrock  
Rothrock-Carstens Company  
E. 715 Sprague Avenue  
Spokane, WA 99202

Dear Mr. Rothrock:

I have received two separate complaints alleging that polychlorinated biphenyls (PCB's) and mercury containers have been deposited on Alaska Steel and Junk Company property. I have been informed that you are the current owner of that property and that you have been informed of at least one of the allegations. Additionally, I have been contacted by Dr. George Maddox, acting as your consultant in the matter.

I do not know if there is any basis to the allegations which have been made, but do feel that some investigation is required to determine the presence or absence of contamination. The property in question is underlain by the Spokane Aquifer. If the allegations being made have validity, it is possible that a significant threat to the underlying ground water may exist.

As the property owner, you are responsible for investigating and, if necessary, mitigating any problems associated with contamination that may be present. Since I have not been contacted by you directly, I am writing to determine your intentions regarding the property. I am requesting that you provide a written response to me within fifteen (15) days of receipt of this letter, detailing the following:

1. The results of any soil sampling for chemical contamination conducted on the Alaska Steel and Junk Company property.
2. Your plans for investigating alleged chemical contamination of the Alaska Steel and Junk Company property.
3. Your intentions for mitigating any chemical contamination that may be found to exist on the Alaska Steel and Junk Company property.

Your prompt attention to this matter is requested. Please contact me if you have any questions.

Sincerely,

James L. Malm  
Environmental Quality Division

JLM:adw

CERTIFIED MAIL



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

RECEIVED

JUN 3 1986

N. 4001 Marine Suite 100 • Spokane Washington 99205-1205 • (509) 455-2000

May 20, 1986

DEPARTMENT OF ECOLOGY  
SPOKANE REGIONAL OFFICE

Mr. "Rocky" Rothrock  
Rothrock-Carstens Company  
E. 715 Sprague Avenue  
Spokane, WA 99202

RECEIVED MAY 20 1986

Dear Mr. Rothrock:

I have received two separate complaints alleging that polychlorinated biphenyls (PCB's) and mercury containers have been deposited on Alaska Steel and Junk Company property. I have been informed that you are the current owner of that property and that you have been informed of at least one of the allegations. Additionally, I have been contacted by Dr. George Maddox, acting as your consultant in the matter.

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Sincerely,

  
James L. Malm  
Environmental Quality Division

JLM:adw

CERTIFIED MAIL



U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 SIXTH AVENUE  
SEATTLE, WASHINGTON 98101

DEC 14 1985

REPLY TO M/S 524  
ATTN OF

Louis Schwartz, Owner  
Alaska Steel and Supply  
5325 - 28th Northwest  
Seattle, Washington 98107

Dear Mr. Schwartz:

On April 23, 1985, an EPA inspection was performed by Mr. Paul Boys at Alaska Steel and Supply in Spokane, Washington. The inspection was carried out to determine compliance with the Polychlorinated Biphenyls (PCB) Regulations adopted by EPA pursuant to the Toxic Substances Control Act (TSCA). At the conclusion of the inspection, I understand that Mr. Boys discussed his preliminary findings with Mr. Dennis Devoyr of Alaska Steel and Supply.

A sample was obtained as part of this inspection. This sample has been analyzed for PCBs by the Environmental Protection Agency analytical laboratory. An annotated copy of that lab report is being forwarded to you with this letter. The analysis involved the testing of the sample for seven characteristic and distinct types of PCB. They are: Aroclor 1221, 1232, 1242, 1248, 1254, 1260, and 1016. The oil sample from the "Moloney CL-1" transformer case contained 20 parts per million (ppm) PCB (Aroclor 1254).

We have completed a review of Mr. Boys' report on this inspection and are pleased to inform you that, at the time of the inspection, there were no violations of the PCB Regulations.

However, since the transformer case which was sampled contains 20 ppm PCB, you should be aware of the following regulation:

Regulation- Disposal

40 C.F.R. §761.20(d) prohibits the use of waste oil that contains any detectable concentration of PCB as a sealant, coating, or dust control agent. This includes but is not limited to, road oiling, general dust control, use as a pesticide or herbicide carrier and use as a rust preventative on pipes.

It is important that the oil ultimately be disposed of properly since liability cannot be contracted away. Were you to sell or give the contaminated oil away to some other party, both parties would be liable if violation of the PCB Regulations occurred.

If you have any questions regarding the inspection or the PCB Regulations, please contact Barbara Ross, EPA Region 10, Pesticides and Toxic Substances Branch, 1200 Sixth Avenue, M/S 524, Seattle, Washington 98101; telephone (206) 442-1985.

Sincerely,

*Barbara Ross, for*

Gil Haselberger, Chief  
Toxic Substances Branch

Enclosure



ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 SIXTH AVENUE  
SEATTLE WASHINGTON 98101

DEC 14 1985

RECEIVED

JUN 3 1986

SEATTLE REGIONAL OFFICE

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Sincerely,

*Barbara Ross, for*

Gil Haselberger, Chief  
Toxic Substances Branch

Enclosure

Maritime Building  
911 Western Avenue, Seattle, WA 98104  
Business • (206) 622-8353

Ref: 126-13

RECEIVED

JUN 3 1986

DEPARTMENT OF ECOLOGY  
SPokane REGIONAL OFFICE

November 5, 1985

Louis Schwartz  
Railwater Terminal Company  
5325 - 28th Avenue N.W.  
Seattle, Washington 98107

Mr. Schwartz:

The samples you delivered to this laboratory on September 27, 1985 have been analyzed for polychlorinated biphenyls (PCB's).

The soils were extracted by sonification in hexane, concentrated and cleaned with silica gel for analysis by electron capture capillary gas chromatography.

RESULTS

SAMPLE	PCB's 1260 (ppb)
"oily"	440
"dry"	120

ppb = parts per billion

Sincerely,  
NORTHWEST ENVIRONMENTAL SERVICES

*Dennis C. Moore*

Dennis C. Moore  
Chemical Technologist

Approved By *RM Orheim*  
Robert M. Orheim  
Director of Laboratories

*Louis:*

*This means you have no PCB problem.*

*Bob Orheim*



# NORTHWEST ENVIRONMENTAL SERVICES

Maritime Building  
911 Western Avenue, Seattle, WA 98104  
(206) 622-8353

To assure proper credit, please return  
of invoice with your remittance.

SOLD TO • Louis Schwartz  
Railwater Terminal Company  
5325 - 28th Avenue N.W.  
Seattle, Washington 98107

INVOICE NO. 2234

DATE November 13, 19

P.O. NUMBER

SHIPPED VIA

Reference: 126-13; 9/27/85

TERMS: NET 30 DAYS

SAMPLES	ANALYSIS	AMOUNT
soils 12	PCB: extraction and cleaning @ \$25.00 per sample	\$ 150.00
	gas chromatography @ \$50 per sample	100.00
	TOTAL	\$ 250.00

Please Pay From Invoice. Statement Issued Only On Request  
1.5% Monthly Interest On Past Due Accounts  
Samples will be discarded after 30 days.

RECEIVED

JUN 3 1986

DEPARTMENT OF ECOLOGY  
SPOKANE REGIONAL OFFICE

## PCB INSPECTION REPORT

RECEIVED  
MAY 23 1985

Facility: Alaska Steel and Supply  
E 3410 Desmet  
Spokane, WA  
Facility Representative: Mr. Dennis Devoyr  
Date of Inspection: April 23, 1985  
Date of Report: May 22, 1985  
EPA Inspector: Paul Boys, Team Leader  
Technical Support Team

PESTIC. XIC  
SUBSTANCES BRANCH

### Compliance History

No previous compliance inspections have been done at this facility.

### Pre-Inspection Conference

I met with Mr. Dennis Devoyr, the manager of Alaska Steel and Supply. I presented my credentials and issued the Notice of Inspection and Notice of Confidentiality (Attachments 1 and 2). I explained the purpose of the inspection and asked Mr. Devoyr if he had any electrical transformers or capacitors. He stated that the company sold part of its business to Pacific Hide several years ago. Since that sale they have not dealt in much electrical equipment. Mr. Devoyr stated that he did have 5 new transformers which they recently bought for future resale. They are not intending to scrap out these 5 transformers. They do not have any capacitors on site according to Mr. Devoyr.

I explained the portions of the PCB regulations related to proper disposal of PCB equipment, classification of transformers, and record keeping requirements. I gave Mr. Devoyr the names and phone numbers for the PCB program office persons who could answer any questions he may have at a later date.

### Inspection of the Facility

I asked to see the 5 transformers and to take a walk through the whole facility. The 5 Dowzer transformers are on pallets in the storage areas (see photos 1 and 2, Attachment 3). The transformer name plates indicate the quantity of oil but not the type of oil. One of the transformers has a broken electrical connector on the top. If the unit was tipped over the oil could spill out.

I noticed an electrical device which I didn't recognize. It was labeled "Westinghouse Regulated Output Ballast, 1000 watt, 40 amp, 890020065," (see photo 3, Attachment 3). There were a number of empty transformer cases on the site which are used as storage containers for scrap metal. One small transformer casing contained oil but no internals (i.e. coils). There was no name plate information on the transformer other than the words "Moloney CL-2," (see photos 4 and 5, Attachment 3).

Sampling

I took a sample of the oil from the "Moloney CL-1" transformer case. I gave Mr. Devoyr a receipt for the sample (Attachment 4). The lab analysis indicates that this oil sample contained 20 ppm of 1254 PCB. A copy of the lab analysis results is attached (Attachment 5).

Closing Discussion

I stated that I did not observe any violations of the PCB regulations, but that the PCB program office would review my report and notify Mr. Devoyr of any problems. Mr. Devoyr asked to be notified of the lab results.

I left the facility at 1:15 a.m.

20-MAY-85

EPA Region X Lab Management System  
\*\*\* Lab Analysis Report \*\*\*

Page 0

Special Restrictors For Transaction Retrieval:

Transaction Range: 00000000 To 99999999

Record Types: 10 20

Record Status Codes: N P F R V Batch: A \*

Project Code: TEC-229A

Work Group Code:

Sample # Range: 0 To 2222222222

Databases to search: CUR VEP

Date since record was last updated:

RECEIVED

JUN 3 1986

DEPARTMENT OF ECOLOGY  
SPOKANE REGIONAL OFFICE

--> Transaction #: 05141732

Work Group: (74) PCB Scan

Instrument: (GCT-TRT) Tracor GC 222 No.2, Tritium EC Detec

Method: (EP2-608) Organochlorine Pesticides and PCBs, GC

Chemist: (RHR) Rlnck, Bob Hours Worked:

Project: TEC-229A ALASKA STEEL AND SUPPLY

Prj Elmt: AFL3A

Prj Off: Boys, Paul

Analysis Due:

Revised Due:

\*\*\* Sample Records in Transaction \*\*\*

Parameter Form File: PCN Title: PCN Analysis

Seq#	Sample #	Date/Time	Description
01	05170310	050423	1105 MOLONEY CL-2 TRANSFORMER

RECEIVED

JUN 3 1986

DEPARTMENT OF  
SPOKANE REGIONAL OFFICE

Record Type: TRNINL Date Verified: 05/05/16 By: Beckner, Laura M.  
Transaction Status: Verified Transaction...Ready to release.  
\*\*\* Verified and transferred to VERTRANS \*\*\*  
Processed: 20-MAY-85 1419156 Status: V Batch: A (in CUR DB)

20-MAY-85

EPA Region X Lab Management System  
\*\*\* Lab Analysis Report \*\*\*

Page 0

Special Restrictors For Transaction Retrieval:

Transaction Range: 00000000 To 99999999

Record Types: 10 20

Record Status Codes: N P F R V Batch: A \*

Project Code: TEC-229A

Work Group Code:

Sample # Range: 0 To ZZZZZZZZZZ

Databases to search: CUR VER

Date since record was last updated:

Attachment 5

\*\*\* Lab Analysis Report \*\*\*

=> Transaction #: 05141332

Work Group: (74) PCB Scan

Instrument: (GCT-TRT ) Tracor GC 222 No.2, Tritium EC Detec

Method: (EP2-608 ) Organochlorine Pesticides and PCBs, GC

Chemist: (RHR) Rieck, Bob Hours Worked:

Project: TEC-229A ALASKA STEEL AND SUPPLY Prg Ele#: AFL3A

Prj Off: Boys, Paul Analysis Due: Revised Due:

\*\*\* Sample Records in Transaction \*\*\*

Parameter Form File: PCB		Title: PCB Analysis	
Seq#	Sample #	Date/Time	Description
01	85170310	850423 1105	MOLONEY CL-2 TRANSFORMER

Record Type: TRNIN1 Date Verified: 85/05/16 By: Beckner, Laura M.  
Transaction Status: Verified Transaction...Ready to release.  
\*\*\* Verified and Transferred to VERTRANS \*\*\*  
Processed: 20-MAY-85 14:19:56 Status: V Batch: A (In CUR DB)

Transaction #: 05141332  
Proj Code : TEC-229A ALASKA STEEL AND SUPPLY (74) PCB Scan

PE # : AFL13A

Sample Id: 85170310  
Matrix: Oil/Solve  
Units: ug/gm  
# Sids:  
QA Code:  
Date Extract: 850429  
Date Analyzd: 850510  
1 PCB - 1016 1U  
2 PCB - 1221 1U  
3 PCB - 1232 1U  
4 PCB - 1242 1U  
5 PCB - 1248 1U  
6 PCB - 1254 20  
7 PCB - 1260 1U



20-MAY-85

EPA Region X Lab Management System  
\*\*\* Lab Analysis Report \*\*\*

Page 2

Transaction #: 05141332 (74) PCB Scan  
Proj Code : TEC-229A ALASKA STEEL AND SUPPLY

PE # : AFL13A

Sample ID:

AS170310

Matrix:

D11/Solids

Units:

ug/gm = ppm

QA Code:

050429

Date Analyzed:

050510

1 PCB - 1016 10  
2 PCB - 1221 10  
3 PCB - 1232 10  
4 PCB - 1242 10  
5 PCB - 1240 20  
6 PCB - 1254 10  
7 PCB - 1260 10

Concentration at the 1 ppm level

JUL 3 1985

Specimen F-1000



United States  
Environmental Protection  
Agency

Region 10  
1200 Sixth Avenue  
Seattle WA 98101

Attachment 2

## TSCA Inspection Confidentiality Notice

Facility Name & Address <i>Alaska Steel &amp; Supply E. 3410 Desmet Spokane, Wa. 99020</i>	This Notice Given To Name: <i>Mr. Dennis Devoyr</i> Title: <i>Manager</i>
Name and Address of Chief Officer of Business: <i>Louis Schwartz 5325 28th NW Seattle, Wa. 98107</i>	Date This Notice Mailed To Chief Officer of Business: <i>4/29/85</i>
Inspection Date: <i>4/23/85</i>	Name of Inspector: <i>Paul A. Boys</i>

It is possible that EPA will receive public requests for release of data and/or documents obtained by inspectors during inspection of the facility indicated above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 522, EPA regulations issued thereunder, 40 CFR Part 2, and the Toxic Substances Control Act Section 14. EPA is required to make documents available in response to FOIA requests unless the Administrator of the agency determines that the data or documents are exempt from disclosure.

Please provide us with a statement specifying any information obtained during our inspection you believe should be exempt from disclosure. This will facilitate the Agency's timely response to any public inquiries, and evaluation of your company's claim of confidentiality.

Your statement should be addressed to: **Document Control Officer, Pesticides & Toxic Substances Branch, M/S 524, U.S. Environmental Protection Agency, 1200 Sixth Avenue, Seattle, Washington 98101**, and should reach this address no later than 7 days after your receipt of this notice. Failure to submit a written request that specified information be characterized as confidential, privileged, or exempt from disclosure within 7 days will be treated by EPA as a waiver of your claims for confidentiality regarding the inspection data. Any non-exempt data may be made available to the public without further notice to you.

*4/23/85*  
Date Received by Facility

*[Signature]*  
Signature of Plant Representative

PS Form 3811, July 1983 447-845

DOMESTIC RETURN RECEIPT

**SENDER: Complete items 1, 2, 3 and 4.**

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☒ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:  
Louis Schwartz  
Alaska Steel and Supply  
5325 - 28th NW  
Seattle, WA 98107

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured	P-195-121-248
<input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD	
<input type="checkbox"/> Express Mail	

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee

X 

6. Signature - Agent

X

7. Date of Delivery

4-20-5

8. Addressee's Address (ONLY if requested and fee paid)









United States  
Environmental Protection  
Agency

Region 10  
200 Sixth Avenue  
Seattle WA 98101

Attachment 4

## Receipt for Sample(s)

Company Name & Address

Alaska Steel & Supply  
E. 3410 Desmet  
Spokane, WA 99020

Plant Manager or Representative

Mr. Dennis Devoyr

### Samples Collected

Location	Lab Number	Date	Time
Moloney CL-2 Transformer	4517 0510	4/23/85	11:05

### Sample Type & Size

Water	Sediment	Tissue	Oil	Soil	Other	Swabs	Number of Bottles

### Collected by:

Name	Title	Signature
Paul A. Boys	Chemical Engineer	Paul A. Boys

### Duplicate Samples

☐ Requested & Provided ☒ Not Requested

Lab Numbers of Duplicate Samples

### Acknowledgement of Plant Manager or Representative

The undersigned acknowledges that the above described samples have been collected.

Name: Mr. Dennis Devoyr	Date: 4/23/85
Signature:	Title: Manager



# VIOLATION ASSESSMENT

Barbara Ross Environmental Protection Specialist  
(Name & title of Evaluator) 11-13-85

TSCA	<input checked="" type="checkbox"/>
FIFRA	<input type="checkbox"/>

## ACTION TAKEN

<input checked="" type="checkbox"/>	No Action Indicated
<input type="checkbox"/>	Notice Noncompliance
<input type="checkbox"/>	Refer for Ad. Civil Penalty
<input type="checkbox"/>	Refer for Criminal Penalty
<input type="checkbox"/>	Refer to State

April 23, 1985  
Date of Inspection

Paul Boys  
Name of Inspector

### Comments:

No previous PCB inspections have been conducted by EPA at this facility.

There were five new transformers here.

A sample was taken from a small transformer casing which had no name plate information. The lab analysis indicated that the sample contained 20ppm PCB - Aroclor 1254.

I recommend sending a letter stating that no violations were observed at the time of the inspection. Also, the letter could include the part of the regulation (40 CFR 761.20(d)) which prohibits the use of waste oil that contains any detectable concentration of PCB as a sealant, coating, or dust control agent.

Concur

Do not Concur

FATES INSPECTION # 850423-1642-1

DATE ENTERED 11-13-85

CASE # \_\_\_\_\_

DATE ENTERED \_\_\_\_\_



U.S. ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460  
TOXIC SUBSTANCE CONTROL ACT  
INVESTIGATION SUMMARY

11. Facility Name

Alaska Steel and Supply

1. INVESTIGATION IDENTIFICATION

2. Region/State

12. Street

Date 4-23-85  
Inspector Number 1642  
Daily Sequence 2

10

E 3410 Desmet

3. Inspecting Org. C ☐ E ☒ S ☐  
4. Contract Number  
5. Contract Work Order

6. Facility Function US  
7. Invest. Type NSR  
8. Reason for Investigation NSR

13. City Spokane  
14. State WA  
15. ZIP Code 99020

9. Referral Agency  
10. Warrant Required Yes ☐ No ☐

16. DUNS Number 02-749-5266  
17. SIC Codes

SAMPLE INFORMATION

18. Sample Sequence Number  
19. State Sample Number 85170310  
18. Sample Sequence Number  
19. State Sample Number

20. CAS Number  
21. Project Code oil  
20. CAS Number  
21. Project Code

22. Sample Medium OIL  
23. Date Collected  
22. Sample Medium  
23. Date Collected

24. Lot or Other Codes  
25. Date Shipped  
24. Lot or Other Codes  
25. Date Shipped

26. Sample Identification  
Yes, 1 sample  
26. Sample Identification

27. Amount Before Sampling  
27. Amount Before Sampling

28. Sample Description  
28. Sample Description

OTHER FACILITIES

29. Manufacturer/Processor (Other than above)  
30. City  
31. State  
32. ZIP Code  
33. DUNS Number  
29. Manufacturer/Processor (Other than above)  
30. City  
31. State  
32. ZIP Code  
33. DUNS Number

RECORDS

34. Original Records  
35. Sample Delivered To  
36. Date  
37. Remarks  
34. Original Records  
35. Sample Delivered To  
36. Date  
37. Remarks

INSPECTION DOCUMENTS

38. Credentials Presented ☒  
39. Notice of Inspection ☒  
40. Notice of Confidentiality ☒  
41. Chain of Custody ☒  
42. Receipt for Samples/Documents ☒  
43. Declaration of Confidentiality ☐

44. Inspector's Name Paul A. Boys  
45. Inspector's Signature FATS NOV 13 1985





United States  
Environmental Protection  
Agency

Region 10  
1200 Sixth Avenue  
Seattle WA 98101

Attachment 1

## Toxic Substances Control Act: Notice of Inspection

Name & Address of Firm:

Alaska Steel & Supply  
E. 3410 Desmet  
Spokane, WA 99020

Date of Inspection:

4/23/85

Hour:

10:00 am

### Reason for Inspection:

- ☒ For the purpose of inspecting (including taking samples, photographs and other inspection activities) premises in which chemical substances or mixtures or articles containing same are manufactured, processed, or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures or articles within or associated with such premises have been complied with.
- ☐ For the purpose of inspecting (including taking samples, photographs and other inspection activities) conveyances used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures or articles within or associated with the conveyances have been complied with.
- ☐ In addition, this inspection extends to (circle appropriate letters):
- A) Financial Data
  - B) Sales Data
  - C) Pricing Data
  - D) Personnel Data
  - E) Research Data

The nature and extent of the data to be inspected as specified in A through E above is as follows:

Name of Person to Whom Notice  
of Inspection Was Delivered:

Mr. Dennis Revoyr

Title

Manager

Signature of EPA Inspector

Paul A. Boyz

Title & Date

Chemical Engineer  
4/23/85